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**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ADMIRAL INSURANCE COMPANY,

Plaintiff,

vs.

KABUL, INC. d/b/a FASTRIP PWC RENTALS,
 KABUL, INC. d/b/a FASTRIP FOOD STORE,

Defendants.

Case No.:

2:24-cv-02060-GMN-MDC

**STIPULATION AND ORDER TO
 EXTEND TIME FOR KABUL,
 INC. TO RESPOND TO
 ADMIRAL'S SPECIAL MOTION
 TO DISMISS COUNTERCLAIMS
 PURSUANT TO NRS 41.660 AND
 MOTION TO DISMISS
 PURSUANT TO FRCP
 12(B)(6)(ECF#48), SECOND
 MOTION TO DISMISS (#49),
 AND REQUEST FOR JUDICIAL
 NOTICE(#50)
 (FIRST REQUEST)**

KABUL, INC., dba FASTRIP PWC and
 FASTRIP FOOD STORE,
 Counter/Cross/Third Party Claimant,
 v.
 ADMIRAL INSURANCE COMPANY,
 GREGG EIDSNESS FARM BUREAU
 FINANCIAL SERVICES, NBS Insurance
 Agency, Inc. aka NATIONWIDE
 BROKERAGE SOLUTIONS, RT SPECIALTY,
 RSG SPECIALTY, LLC, RYAN SPECIALTY,
 LLC, ERIK W. FOX, WOLFE & WYMAN,
 LLP, KEVIN R. STOLWORTHY,
 ARMSTRONG TEASDALE, LLP, and DOES I
 through X, inclusive; and ROE
 CORPORATIONS I through X, inclusive,
 Counter/Cross/Third Party Defendants.

1 The parties, by and through their respective counsel, hereby stipulate and agree, subject to
2 this Court's approval, to extend the time for Defendant/Counter/Cross/Third Party Claimant
3 KABUL, Inc. ("Kabul") to respond to Motions filed by Plaintiff/CounterDefendant Admiral
4 Insurance Company ("Admiral") in an effort to promote overall efficiency and judicial economy.
5 THEREFORE, the parties stipulate and request that the Court enter an order approving the
6 proposed extensions as set forth below.
7

8 WHEREAS, on or about June 10, 2025, Kabul filed its Answer and Counter/cross/Third
9 Party Complaint. (ECF#33) wherein additional parties and claims were added to the case.

10 WHEREAS, on July 22, 2025, Admiral filed a Special Motion to Dismiss Counterclaims
11 Pursuant to NRS 41.660 (ECF#48), a Motion to Dismiss Pursuant to FRCP 12(B)(6) (ECF#49),
12 and a Request for Judicial Notice (ECF#50). The responses to these Motions are currently due
13 August 5, 2025.
14

15 WHEREAS the parties hereto have met and conferred regarding extending the deadlines to
16 the pending Motions identified as ECFs # 48, 49, and 50 herein.

17 WHEREAS this is the first request to extend the deadlines and good cause exists based
18 upon scheduling conflicts and the desire to consolidate responses for judicial efficiency. Lead
19 Counsel for Plaintiff was out of the office visiting family on a planned vacation at the time the
20 Motions were filed; also, he has a cruise planned for 14 days in August and will have limited
21 internet capabilities. The plaintiff's counsel's firm consists of only two lawyers. The other lawyer
22 has been away from the office during the last part of July and will again be away from the office
23 in the beginning and middle of August due to moving children to colleges across the country (and
24 even abroad). Therefore, responding timely to the Motions is not practical or possible.
25 Additionally, there is a related case that was filed in State Court and removed to this Court.
26
27
28

Kabul has moved for remand and Admiral has moved to consolidate. (See ECF #57 and ECF #22 in 2:25-cv-01343-APG-MDC) Responses to the Motion for Remand are due August 12, 2025 and Responses to the Motions to Consolidate are due August 18, 2025. Therefore, for judicial economy, it is beneficial to expand the time for the responses to the instant Motions.

IT IS HEREBY STIPULATED by and among counsel for Admiral and Kabul that the deadlines for Kabul's responses to ECFs 48, 49 and 50 shall be extended to September 5, 2025.

IT IS SO STIPULATED.

Dated this 5th day of August, 2025.

CHRISTENSEN LAW OFFICES, LLC

BY: /s/Thomas Christensen

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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
DATED: August 6, 2025